

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
Brownsville Division

STATE OF TEXAS, *et al.*

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*

Defendants

Case No. 1:14-cv-254

**SHERIFF JOE ARPAIO'S MOTION SEEKING FURTHER LEAVE OF COURT TO
FILE NOTICE, SUGGESTION AND RECOMMENDATION FOR ISSUANCE OF
ORDER TO SHOW CAUSE CONCERNING ENFORCEMENT OF COURT'S ORDER
BY AMICUS CURIAE SHERIFF JOE ARPAIO'S**

Amicus Curiae Joe Arpaio, elected Sheriff of Maricopa County, Arizona, by counsel, seeks further leave of Court to file a further document in the role of *Amicus Curiae* bringing to the Court's attention information and reports that the U.S. Government appears to be moving forward "full throttle" with implementation of the executive action "deferred action" programs that the Court enjoined by its February 16, 2015, temporary injunction.

If the Defendants have in fact halted implementation of the programs in compliance with the Court's temporary injunction, the opportunity to assure the Court and other observers of this may be afforded by the Court asking for a response on whether the reports of continued implementation are accurate and whether the injunction is being complied with.

CERTIFICATE OF CONSULTATION

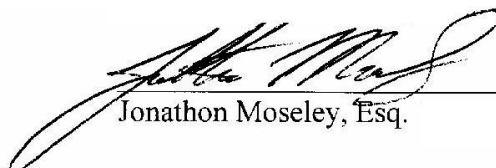
Counsel for Sheriff Joe Arpaio inquired of the parties about whether they would object or consent to the filing of this Notice and Suggestion. The Defendants, by counsel Kyle Freeny,

respond that they object to the filing of the document and the Plaintiffs, by counsel Angela Colmenero that they take no position on the question.

Dated: February 27, 2015

Respectfully submitted,

Larry Klayman, Esq.
Washington, D.C. Bar No. 334581
Freedom Watch, Inc.
2020 Pennsylvania Avenue N.W., Suite 345
Washington, D.C. 20006
(310) 595-0800
leklayman@gmail.com
Of Counsel



Virginia State Bar No. 41058
Freedom Watch, Inc.
2020 Pennsylvania Avenue N.W., Suite 345
Washington, D.C. 20006
(310) 595-0800
leklayman@gmail.com
Attorney for Plaintiff
Pro Hac Vice Approved

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing motion will be delivered electronically on February 27, 2015, to counsel for Plaintiffs and Defendants through the District's Electronic Case Filing system.

